

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

AMAZON.COM, INC. and AMAZON  
DATA SERVICES, INC.,

Plaintiffs,

v.

WDC HOLDINGS LLC dba NORTHSTAR  
COMMERCIAL PARTNERS; BRIAN  
WATSON; STERLING NCP FF, LLC;  
MANASSAS NCP FF, LLC; NSIPI  
ADMINISTRATIVE MANAGER; NOVA  
WPC LLC; WHITE PEAKS CAPITAL LLC;  
VILLANOVA TRUST; CASEY  
KIRSCHNER; ALLCORE DEVELOPMENT  
LLC; FINBRIT HOLDINGS LLC;  
CHESHIRE VENTURES LLC; CARLETON  
NELSON; JOHN DOES 1-20,

Defendants.

CASE NO. 1:20-CV-484-RDA-TCB

800 HOYT LLC,

Intervening Interpleader  
Plaintiff / Intervening  
Interpleader Counter-  
Defendant,

v.

BRIAN WATSON; WDC HOLDINGS, LLC;  
BW HOLDINGS, LLC,

Interpleader Defendants,

and

AMAZON.COM, INC., and AMAZON  
DATA SERVICES, INC.,

Interpleader Defendants /  
Interpleader Counter-Plaintiffs.

**DECLARATION OF DAVID W. CASAZZA IN SUPPORT OF PLAINTIFFS'  
MOTION TO WITHDRAW AND SUBSTITUTE VERIFICATIONS AND  
CERTAIN DECLARATIONS AND FOR PROTECTIVE ORDER**

I, David W. Casazza, hereby declare as follows:

1. I am over the age of 18 years. I am an attorney licensed to practice law in the State of New York and the District of Columbia. I am an attorney at the law firm of Gibson, Dunn & Crutcher, LLP, and counsel for Amazon.com, Inc. and Amazon Data Services, Inc. (collectively “Amazon”). I make this declaration in support of Plaintiffs’ Motion to Withdraw and Substitute Verifications and Certain Declarations and for a Protective Order.

2. Attached to this declaration are the following documents:

3. **Exhibit 1** is a true and correct copy of the Verified Complaint and Demand for Jury Trial, filed as Docket Entry 1.

4. **Exhibit 2** is a true and correct copy of the Corrected Verified First Amended Complaint and Demand for Jury Trial filed, as Docket Entry 100.

5. **Exhibit 3** is a true and correct copy of the Verified Second Amended Complaint and Demand for Jury Trial filed, as Docket Entry 150.

6. **Exhibit 4** is a true and correct copy of the Declaration of Lora E. MacDonald In Support of Plaintiffs’ Motion for *Ex Parte* Temporary Restraining Order and Order to Show Cause Re Preliminary Injunction, filed as Docket Entry 12.

7. **Exhibit 5** is a true and correct copy of the Declaration of Lora E. MacDonald In Support of Plaintiffs’ Verified First Amended Complaint, filed as Docket Entry 106.

8. **Exhibit 6** is a true and correct copy of the Declaration of Lora E. MacDonald in support of Plaintiffs’ Verified Second Amended Complaint, filed as Docket Entry 155.

9. **Exhibit 7** is a true and correct copy of the Declaration of Lora E. MacDonald executed on April 27, 2020, and filed as Docket Entry 12-40.

10. **Exhibit 8** is a true and correct copy of the Declaration of Lora E. MacDonald executed on April 27, 2020, and filed as Docket Entry 12-43.

11. **Exhibit 9** is a true and correct copy of the substitute declaration Amazon offers in place of the withdrawn documents.

12. **Exhibit 10** is a true and correct copy of the Declaration of D. Matthew Doden in Support of Plaintiffs' Supplemental Memorandum in Support of Show Cause Order and Plaintiffs' Application for Preliminary Injunction, executed on May 18, 2020, and refiled on the public docket as Docket Entry 59.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed on March 25, 2022.

  
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David W. Casazza